

# **Exhibit Q**

# **EXHIBIT 48**

**EXHIBIT FILED UNDER SEAL**

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UBER TECHNOLOGIES, INC., RASIER, LLC,

and RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES,  
INC., PASSENGER SEXUAL  
ASSAULT LITIGATION

Case No. 3:23-md-03084-CRB

**DECLARATION OF TODD GADDIS**

This Document Relates to:

Judge: Hon. Lisa J. Cisneros

Courtroom: G – 15th Floor

ALL ACTIONS

1 I, Todd Gaddis, hereby declare and state:

2 1. I am a Manager II, Data Science, at Uber Technologies Inc. (“Uber”). I have been  
3 employed at Uber since September 2014, and I have held my current position since March 2021. I  
4 previously held the positions of Manager, Data Analytics; Data Analyst II; Claims Analyst; and  
5 Claims Advocate at Uber. Over the course of my employment at Uber, I have acquired personal  
6 knowledge of Uber’s systems and data sources relating to safety incident reporting.

7 2. The contents of this declaration are true and correct to the best of my knowledge,  
8 information, and belief, and are based on my personal knowledge of Uber’s systems and data  
9 sources relating to safety incident reporting and/or informed conversations with other  
10 knowledgeable employees at Uber. If called upon as a witness in this action, I could and would  
11 testify competently to the matters discussed in this declaration.

12 **Jira and Bliss**

13 3. Uber has previously disclosed fields, and provided convenience descriptions, associated  
14 with SAFE Jira ticket data, Bliss Actions, and Bliss Messages that Uber has used in connection  
15 with alleged sexual assault and sexual misconduct incidents reported to Uber. *See* Convenience  
16 Descriptions (Aug. 23, 2024; Mar. 24, 2025); Katherine McDonald Certification (Feb. 25, 2025);  
17 Katherine McDonald Certification (Jan. 10, 2025).

18 4. In September 2024, Uber produced, through BDO, data from the Bliss Actions, Bliss  
19 Messages, and Jira data tables relating to alleged incidents of sexual assault and sexual  
20 misconduct possibly reported against independent drivers from 2017-2022. In January 2025, Uber  
21 produced, through BDO, data from the Bliss Actions, Bliss Messages, and Jira data tables relating  
22 to alleged incidents of sexual assault and sexual misconduct, regardless of reported-against party,  
23 from the same time period, as well as all data from the Jira Comments data table related to such  
24 incidents. In March 2025, Uber corrected a clerical error in the data and also, at Plaintiffs’  
25 request, produced, through BDO, combined data tables for, respectively, Bliss Actions, Bliss  
26 Messages, Jira, and Jira Comments, preserving in metadata the original table name so Plaintiffs  
27 could determine if a report was possibly made against an independent driver.

1 5. For the period 2017 through the present, Uber has exclusively used Bliss and Jira as the  
2 source systems for recording reported incidents of sexual assault and sexual misconduct. As  
3 discussed further below, for any particular reported incident of sexual assault or sexual  
4 misconduct, Uber maintains – in its data warehouse and/or other systems – other data relating to  
5 the rider, driver, or other characteristics of the trip at issue. Uber may use such data (or inferences  
6 based on such data) in its analyses of reported incidents of sexual assault and sexual misconduct.

7 6. Uber maintains, reviews and analyzes on an ongoing basis data from a variety of sources  
8 related to trips, independent drivers, and riders to conduct its business.

9 **Flack**

10 7. Flack does not contain any data from the sexual assault or sexual misconduct incident  
11 reports themselves that are not also stored in Jira and Bliss for incidents from 2017 to present.

12 8. Uber employees do not input any data, including sexual assault or sexual misconduct  
13 incident report data, into Flack. Rather, Flack aggregates and consolidates data from various  
14 sources, and Flack is used to create logical inferences from that data.

15 9. For example, as Uber’s corporate designee, Katherine McDonald, testified on April 24,  
16 2025, if there are multiple reports for a single incident (*e.g.*, a Jira ticket and one or more Bliss  
17 tickets or multiple Bliss tickets), Flack uses a logic to consolidate those tickets into a single  
18 “event.” The logic, broadly speaking, prioritizes Jira tickets over Bliss tickets and Bliss tickets  
19 with more characters over Bliss tickets with fewer characters. The consolidation is not the result  
20 of an analysis or an adjudication determining the “correct” classification, but rather reflects the  
21 application of the logic. This consolidation is reflected in fields referencing “dominant ticket” in  
22 Flack, as identified and described in the attached listing of fields.

23 10. In addition, as Uber’s corporate designee, Katherine McDonald, testified on April 25,  
24 2025, Flack also applies a logic related to which party in a given incident is possibly or probably  
25 “reported against” by identifying which party was the first to report. Like with the “dominant  
26 ticket,” “reported against” is not the result of an analysis or an adjudication determining the  
27 “correct” party reported against, but rather reflects the application of the logic. This logic is  
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1 reflected in fields referencing “reported against” in Flack, as identified and described in the  
2 attached listing of fields.

3 11. Attached is a listing of the fields, along with descriptions, from Flack’s on trip incidents  
4 database table, which consolidates and aggregates data that is used to create logical inferences,  
5 that Uber has used in connection with alleged sexual assault and sexual misconduct incidents  
6 reported to Uber. These fields are primarily derived from the same Bliss and Jira fields that Uber  
7 produced to Plaintiffs.

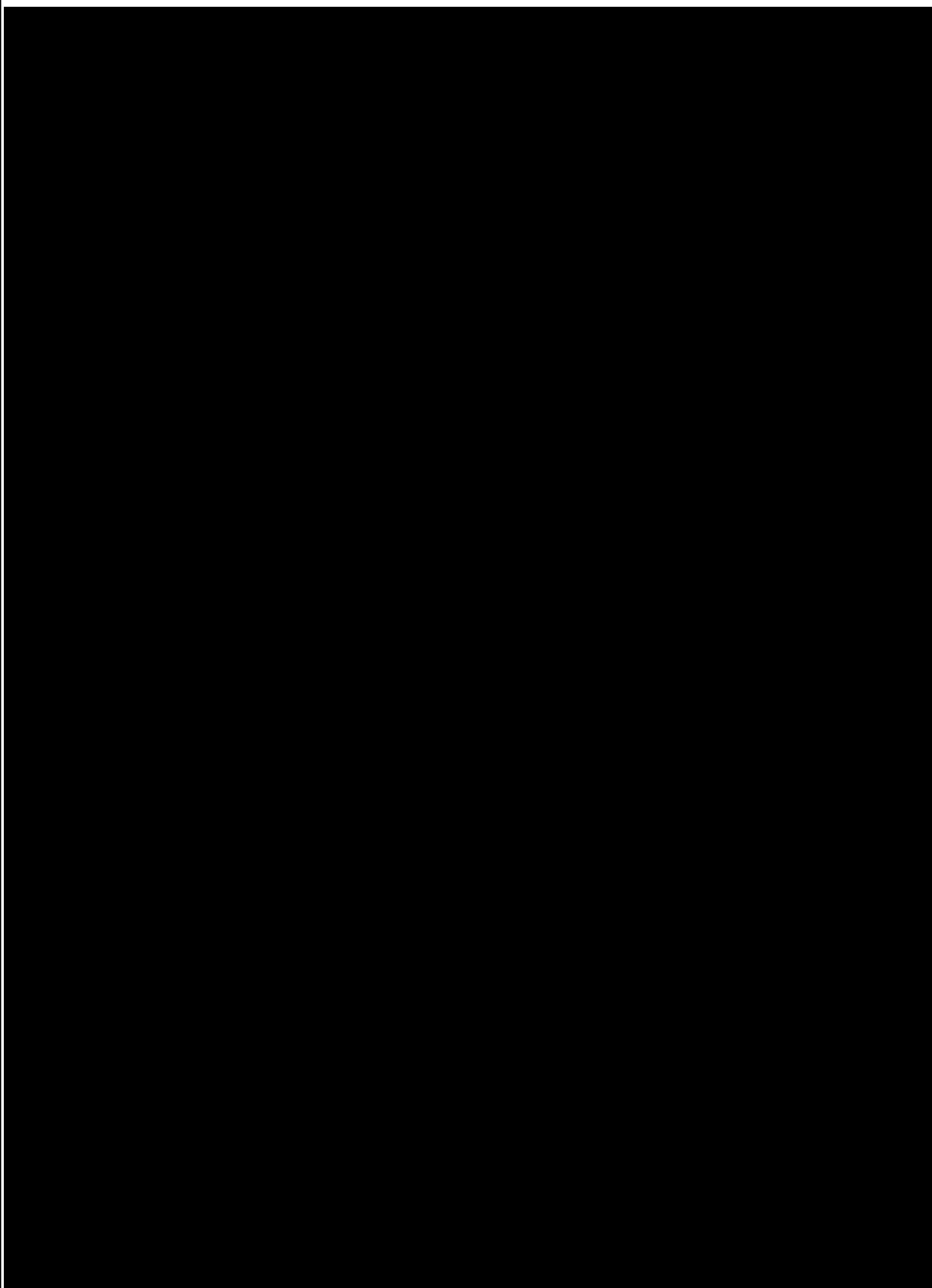
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9 I declare under penalty of perjury that the foregoing is true and correct, and that I executed this  
10 Declaration on August 18, 2025, in San Francisco, CA.

11  
12 *Todd Gaddis*

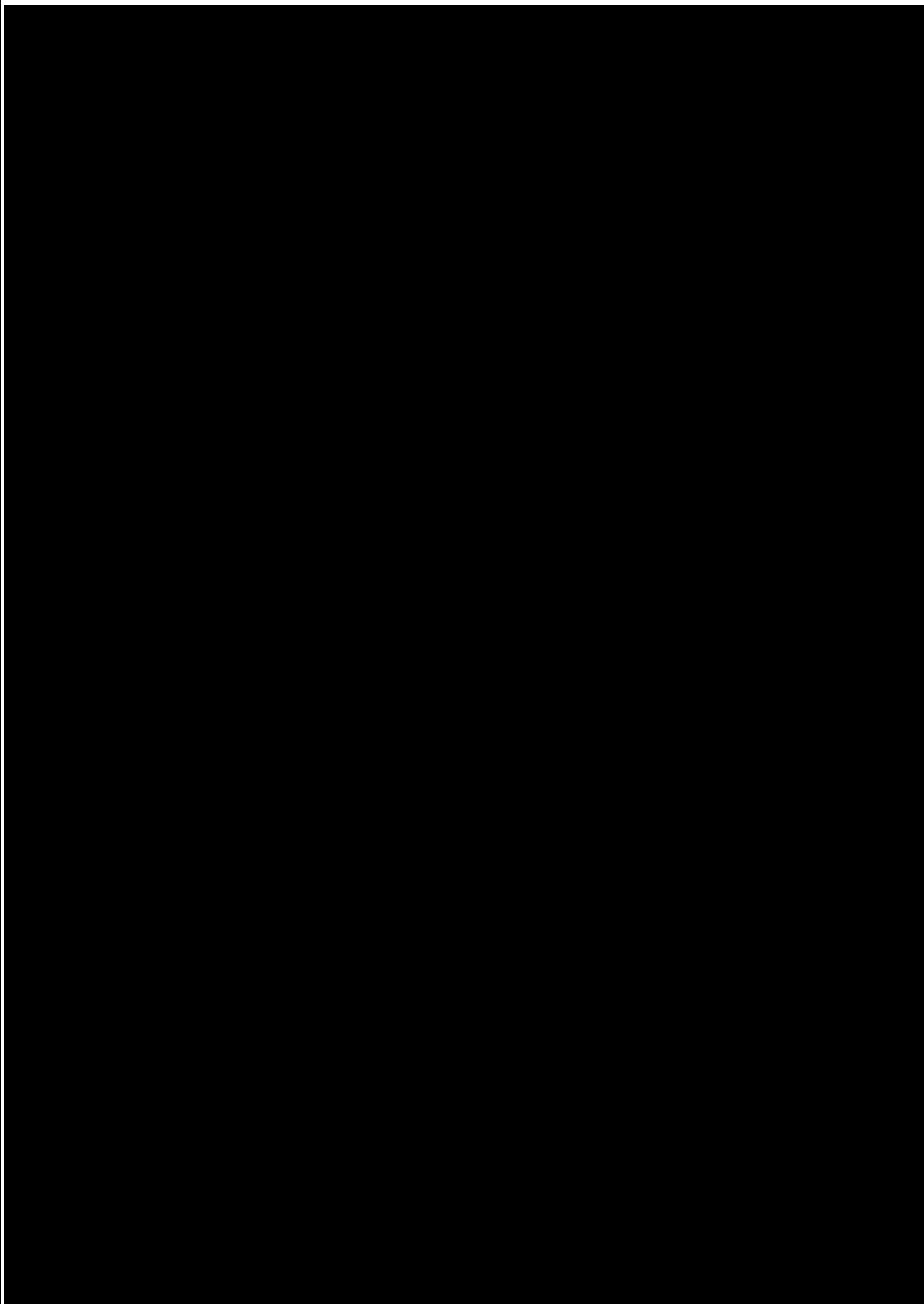
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**Fields Found Within the Flack On Trip Incidents Database Table**

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